

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE ARREST OF
DIDIER SAINT JULIEN

Case No. _____

AFFIDAVIT IN SUPPORT OF COMPLAINT
FOR ARREST WARRANT

I, Azalea J. Husband, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation, and, as such, am an investigative or law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. I am engaged in the enforcement of criminal laws and is within a category of officers authorized by the Attorney General to request and execute search warrants pursuant to Title 18, U.S.C., Sections 3052 and 3107; and DOJ regulations set forth at Title 28, C.F.R., Sections 0.85 and 60.2(a).

2. I have been an employee with the Federal Bureau of Investigation (FBI) since July 2014, and a Special Agent assigned to the Cleveland Division since May 2019. During this time, I have been assigned to investigations involving complex computer crimes and am currently assigned to the FBI Cleveland Division Cyber Crimes Squad where I am responsible for investigations involving computer-related offenses. I have received specialized training at the FBI Academy, in Quantico, Virginia, in a variety of Federal criminal violations, including training on how to conduct surveillance, conduct electronic and physical searches, interview and interrogation techniques, financial investigations (including asset forfeiture and money

laundering tactics), evidence collection, weapons of mass destruction, arrest and search warrant executions, and case preparation.

3. Others at the FBI who have extensive experience in the investigations of criminal acts under jurisdiction of the FBI are also assisting in this investigation.

4. This affidavit is in support of a criminal complaint and application for an arrest warrant for DIDIER SAINT JULIEN. I have probable cause to believe DIDIER SAINT JULIEN has been stalking a person (hereinafter "Victim").

5. Unless otherwise stated, the information contained herein is based on: information provided by FBI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement officers and agents; information gathered from the service of subpoenas; independent investigation and analysis by the FBI agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent with the FBI. Because this affidavit is being submitted for the limited purpose of securing authorization for a criminal complaint and an arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary foundation for the requested relief.

6. The court has jurisdiction to issue the proposed warrant because it is a "court of competent jurisdiction" as defined in 18 U.S.C § 2711. Specifically, the court is a district court of the United States that has jurisdiction over the offense being investigated, see 18 U.S.C. § 2711(3)(A)(i).

RELEVANT STATUTES

7. This investigation concerns alleged violations of Title 18 U.S.C. §§ 2261A(2)(B) and 2261(b)(6), that is Cyberstalking and Cyberstalking in Violation of a Protection Order.

PROBABLE CAUSE

8. On or about June 7, 2019, Victim filed a complaint with the FBI about being stalked since April 2018 in the Northern District of Ohio, Eastern Division and elsewhere.

9. Victim states that since the stalking began he/she has had to change his/her lifestyle and lives in fear for his/her safety due to the actions of DIDIER SAINT JULIEN (hereinafter "DSJ").

10. Since April of 2018, DSJ has made numerous comments on Victim's Facebook and Instagram page. DSJ also attempted to make physical contact with Victim multiple times to include contact during a work event. During this work event DSJ waited for the two hour event to be over before approaching Victim to ask questions.

11. On or about September 1, 2018, DSJ attempted to make physical contact with the Victim. DSJ followed Victim's car into a private parking lot. When DSJ was unable to talk to Victim, DSJ proceeded to take pictures of the Victim's vehicle. DSJ claimed he did this because he walks around downtown Youngstown often and he wanted to be able to spot Victim's car and wait for Victim to talk to him/her.

12. On or about August 20, 2018, DSJ began contacting Victim's father through an internet communication portal. The FBI is aware of 5 incidents in which DSJ tried to contact the Victim's father through this portal.

13. On or about September 8, 2018, DSJ sent Victim a Facebook direct message. In that message DSJ acknowledged being blocked on Victim's Instagram, commenting on Victim's posts too much, and watching the Victim.

14. On or about January 7, 2019, DSJ attempted to contact Victim's sister via telephone. DSJ attempted two more times after this date to contact Victim's sister. At this point DSJ was put on a do not contact list at the Victim's sisters place of employment.

15. On or about January 10, 2019, in order to prevent future harassment, contact, and communication from DSJ, Victim petitioned the court for a Civil Stalking Protection Order Ex Parte against DSJ. Magistrate Judge Welsh of the Mahoning County Court of Common Pleas granted the order which included Victim and Victim's family members. The order commanded DSJ not to initiate or have any contact with the protected persons. Contact includes any communication via landline, cordless, cellular or digital telephone, text, instant messaging, fax, email, voice mail, delivery service, social networking media, blogging, writings, electronic communications, or communications by any other means directly or through another person.

16. On or about January 11, 2019, Victim received a text message from (330) 881-0483. A subpoena showed that the subscriber of that phone number is DSJ. In the text, DSJ states in part, "I don't know why I did what I did. All I can say is that I was up to no good. I am so, so sorry for what I did. I am filled with guilt and I'm so ashamed of how I acted."

17. On or about January 15, 2019, through on or about April 22, 2019, DSJ began to contact Victim's friend. DSJ contacted Victim's friend on his/her personal cell phone and personal e-mail account. DSJ contacted Victim's friend a total of four times that we are aware of, to include an attempt to request Victim's friend on Instagram.

18. On or about January 22, 2019, Judge Krishbaum of the Mahoning County Court of Common Pleas granted a Civil Stalking Protection Order for a term of 5 years to protect Victim and Victim's family members. The order commanded DSJ not to initiate or have any contact with the protected persons. Contact includes any communication via landline, cordless, cellular or digital telephone, text, instant messaging, fax, email, voice mail, delivery service, social networking media, blogging, writings, electronic communications, or communications by any other means directly or through another person.

19. In or around May of 2019, DSJ began creating electronic social media accounts under a false name. DSJ attempted to make contact with Victim through these accounts, communications include commenting on Victim's Instagram and Facebook.

20. FBI agents discovered that DSJ frequented the Newport Branch Library in Youngstown, OH. Librarians from the Newport Branch Library were interviewed. The librarians stated that DSJ had been frequenting the Newport Branch Library for a few years. DSJ was known for buying multiple flash drives and then breaking them inside the library computers. DSJ would sometimes borrow the library's public flash drive and store documents on it.

21. DSJ began asking the librarians for assistance with uploading Caucasian female photos to electronic social media profiles he was creating on the computer.

22. A document was acquired that was written by DSJ. In this document DSJ acknowledges many of the facts stated in this affidavit.

23. Victim has made many life changes since the stalking began. Victim terminated the lease early on the apartment he/she was residing in because DSJ found out where Victim lived. Victim began staying at different friends' residences out of fear that DSJ would find out

where he/she resided again. Victim began carrying TASER's wherever he/she would go and would even sleep with one. Victim has sought treatment for the mental distress caused by DSJ's stalking.

24. Victim's father, when interviewed, stated that Victim has become fearful and untrusting since DSJ's stalking began. Victim's longtime friend stated that Victim has seemed more paranoid and sees how much the stalking has weighed on Victim.

TECHNICAL TERMS

25. Based on my training and experience, I use the following technical terms to convey the following meanings:

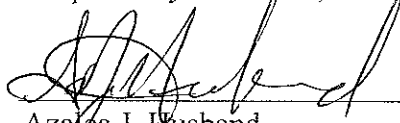
- a. Flash Drive: a portable storage device that uses flash memory. It is recognized by a computer's operating system as a removable device. A flash drive can store important files and data backups, carry favorite settings or applications, run diagnostics to troubleshoot computer problems or launch an OS from a bootable USB.
- b. Facebook: Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public. Users can access Facebook through the Facebook website or by using a special electronic applications ("app") created by the company that allows users to access the service through a mobile device.

- c. Instagram: Instagram owns and operates a free-access social-networking website of the same name that can be accessed at <http://www.instagram.com>. Instagram allows its users to create their own profile pages, which can include a short biography, a photo of themselves, and other information. Users can access Instagram through the Instagram website or by using a special electronic applications ("app") created by the company that allows users to access the service through a mobile device.

CONCLUSION

Based on the foregoing, there is probable cause to believe that DIDIER SAINT JULIEN has violated provisions of Title 18 U.S.C. §§ 2261A(2)(B) and 2261(b)(6), that is Cyberstalking and Cyberstalking in Violation of a Protection Order. I respectfully request the attached warrant be issued authorizing the arrest of DIDIER SANIT JULIEN.

Respectfully submitted,



Azalea J. Husband
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me
on 9 day of August 9, 2019:


UNITED STATES MAGISTRATE JUDGE